

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

IN RE: GERBER PRODUCTS COMPANY
HEAVY METALS BABY FOOD
LITIGATION

Master File No. 1:21-cv-00269 (MSN/JFA)

This Document Relates to ALL Cases

**MEMORANDUM IN SUPPORT OF MOTION TO SEAL PLAINTIFFS' MOTION TO
COMPEL NESTLÉ DOCUMENTS, CUSTODIANS, AND SUBSTANTIAL
COMPLETION DATE**

Plaintiffs, by counsel and pursuant to Local Civil Rule 5, submit this Memorandum in Support of Plaintiffs' Motion to Seal Plaintiffs' Motion to Compel Nestlé Documents, Custodians, and Substantial Completion Date (the "Sealing Motion"). In their contemporaneously-filed Motion to Compel Nestlé Documents, Custodians, and Substantial Completion Date, Plaintiffs discuss and cite to a document that Gerber has designated as "Highly Confidential."

The "Highly Confidential" document is a letter submitted by Gerber to the House Subcommittee on Economic and Consumer Policy. This document is attached as Exhibit A to Plaintiffs' Motion to Compel. Plaintiffs invite Defendant to justify designation of this document as confidential.

Dated: August 26, 2022

By: /s/ Steven J. Toll

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CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

By: /s/ Steven J. Toll

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